

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

PETER WILSON, individually and on behalf of all others similarly situated, <i>Plaintiff,</i>	§ § § § § § § § § §	vs. CIVIL ACTION NO. 4:24-CV-04003
TEXONA MARKETING, LLC d/b/a COLLINS GHOSTWRITING, <i>Defendant.</i>		

DEFENDANT’S MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Defendant Texona Marketing, LLC d/b/a Collins Ghostwriting, respectfully file this Motion for Extension of Time to File Answer. Defendant would show unto the Court the following:

STATEMENT OF FACTS

1. The Original Complaint in this matter was originally filed on or about October 18, 2024.
2. Defendant was served on or about November 12, 2024.
3. The deadline to file an Answer in this matter was on or about December 3, 2024.

NEED FOR EXTENSION OF TIME

4. Because of the Thanksgiving holiday and the death of a close family friend, the undersigned counsel for Defendant has been unable to fully investigate the claims of Plaintiff’s Class Action Complaint for purposes of preparing an Answer.
5. Considering the circumstances, and the undersigned counsel needs an opportunity to properly review and investigate Plaintiff’s Class Complaint, Defendant

requests the Court grant an extension until January 8, 2025 for Defendant to file an Answer.

6. A court may grant a request to extend time for good cause. Fed. R. Civ. P. 6(b)(1)(A); see *Jenkins v. Commonwealth Land Title Ins. Co.*, 95 F.3d 791, 795 (9th Cir. 1996).

7. Defendant has filed this Motion for Extension of Time so that justice may be done and not for purposes of delay.

8. Defendant's counsel has attempted to confer with Plaintiff's counsel regarding the filing of this motion, and counsel for Plaintiff has agreed to an extension until January 8, 2025.

WHEREFORE, PREMISES CONSIDERED, Defendant Texona Marketing, LLC d/b/a Collins Ghostwriting respectfully prays that the Court grants its Motion for Extension of Time and for further relief, either at law or in equity, to which they may be justly entitled.

Dated: December 6, 2024

Respectfully submitted,

/s/ Ali A. Hakeem

Ali A. Hakeem

Of Counsel

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2024, I electronically filed the foregoing with the clerk of the court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ Ali A. Hakeem

Ali A. Hakeem